

# INFORMATION ONLY

ROCKY FLATS ENVIRONMENTAL  
TECHNOLOGY SITE

Manual No.:

2-11000-ER-ADM  
(a.k.a. 3-21000-ADM)

ERPD ADMINISTRATIVE  
PROCEDURES MANUAL  
CATEGORY 1

Procedure No.:

Table of Contents, Rev 28

Page:

1 of 2

Effective Date:

12/16/94

Organization:

Environmental Restoration

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DOCUMENT CLASSIFICATION  
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CLASSIFICATION OFFICE

ADMINISTRATIVE

A-SW-001337

**ROCKY FLATS ENVIRONMENTAL  
TECHNOLOGY SITE****ERPD ADMINISTRATIVE  
PROCEDURES MANUAL  
CATEGORY 1****Manual No.:****2-11000-ER-ADM  
(a.k.a. 3-21000-ADM)****Procedure No.:****Table of Contents, Rev 28****Page:****2 of 2****Effective Date:****12/16/94****Organization:****Environmental Restoration**

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*This revision supersedes procedure 3-21000-ADM-17.01 Revision 0.			
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AQD.08	Preparation of EPA Form R	1	10/10/91

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3, 5-6, 8-11, 13-18, 23-25	12/16/94	94-DMR-002243
5, 5A, 7	12/16/94	94-DMR-002243

TOTAL NUMBER OF PAGES: 39

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Doc 12-05-04

1. Date 11/16/94

25. DMR  
DMR No. 91-DMR-002243

3. New Document Number or Document Number if it is to be changed with this Revision  
N/A

5. Document Title

**ERPD Readiness Assessments**

7. Document Modification Type (Check only one)

☐ Other \_\_\_\_\_☐ New ☐ Revision ☐ Intent Change ☒ Nonintent Change ☐ Editorial Correction ☐ Cancellation

8. Item	9. Page	10. Step
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## 11. Proposed Modifications

1	3	TOC	Change 5.4 to "ERPD Quality Assurance Program Manager"
2	5	1	In line six, delete the comma after the word "satisfied," and in line eight, delete the comma after the word "investigation"
3	6	3	In the second paragraph, second line, delete the comma after the word "process"
4	8	4	Under "Non-nuclear Facility," in the third line, put a semi-colon after the word "public," delete "(that is," add "i.e.," then delete the ending parenthesis at the end of the sixth line.
5	9	4	Under "Poststart Open Item," in the first line, delete the semi-colon after the word "verified"
6	9	4	Under "Prestart Open Item," in the first line, delete the semi-colon after the word "verified"

12. Justification (Reason for Modification, EJO #, TP #, etc.)

### Editorial changes, and corrections to Training and Records sections

If modification is for a new procedure or a revision, list concurring disciplines in Block 13, and enter N/A in Blocks 14 and 15. If modification is for any type of change or a cancellation, organizations are listed in Block 13, then Concuror prints, and signs in Block 14, and dates in Block 15.

[illegible]

16. Originator's Supervisor (print/sign/date)  
D. G. Breen *D. G. Breen*

7. Assigned SME/Phone/Pager/Location  
Dave Brown/8745/5244/080.224

18. Cost Center

**19. Charge Number**

20. Requested Completion Date

**21. Effective Date**

22. Accelerated Review? Yes ☒ No ☐

23. ORC Review  
N/A

24. Responsible Manager (print, sign, date)  
K. Bentzen

REVIEWED FOR CLASSIFICATION / UCNI

BY \_\_\_\_\_

DATE \_\_\_\_\_

RF-47940 (5/93)

rec'd in DCC for distribution 4:15 pm. 12/14/94 lme

## DMR (continuation sheet)

Page 2 of 3  
Jan 12-05-94

Refer to 1-A01-PPG-001 for Processing Instructions.

Print or Type All Information (Except Signatures).

25. DMR No. 94-DMR-002243

3. Document Number/Revision 2-G21-ER-ADM-18.03			5. Document Title ERP Readiness Review	
8. Item	9. Page	10. Step	11. Proposed Modifications	
7	9	4	Under "Readiness Assessment (RA)," in the third line delete the comma after the word "satisfied", change the word "indicating" to "and indicates", then delete the entire section within the parentheses, and put the period after the word "phase"	
8	9	4	Under "RA Team (Team)," in the fourth line delete the section within the parentheses and put the period after the word "proceed," and add "i.e. demonstrates that prerequisites have been met." In the fifth line, capitalize the word "leader."	
9	10	4	Under "Work Plan (WP) and Field Sampling Plan (FSP)," in the second line delete the section within the parentheses.	
10	10	5.4	Change the title to read "ERP Quality Assurance Program Manager", and in the second paragraph make it read "Assigns a quality Subject-matter Expert..."	
11	11	5.7	In the third paragraph, fifth line, change the procedure number to "2-F94-ER-ADM-02.01"	
12	13	5.13	Add two paragraphs at the end of the section: "Ensure that all personnel, including subcontractors, are trained and qualified to perform the duties, tasks, and responsibilities described in this procedure." "Ensure that all core and ERP-specific training has been completed and documented, and that copies of all documentation have been forwarded to the ERP training files."	
13	14	6.1	Under "RM [1]", in line two make it read "...initiating an RA, and follow the general..."	
14	15	6.2	Under "Manager, EOM [5]", in line one delete the comma after the word program.	
12. Justification (Reason for Modification)  See front page				

## DMR (continuation sheet)

Page 3 of 3  
Var 12-0594Refer to 1-A01-PPG-001 for Processing Instructions.  
Print or Type All Information (Except Signatures).25. DMR No. 94-DMR-002243

3. Document Number/Revision			5. Document Title
2-G21-ER-ADM-18.01			ERP Readiness Review
8. Item	9. Page	10. Step	11. Proposed Modifications
15	16	6.2	Under "Manager, EOM (continued) [6] [A]" delete the commas after "memorandum" and after "appropriate"
16	17	6.3	Under "Board [6]", make the line read "...not the status, of the RA, by using"
17	18	6.3	Under "ERP RA Coordinator [9]", delete the word "any"
18	23	7	Replace the entire "Records" section as attached.
19	24	8	Three quarters of the way down the page, change the references to read as follows: 2-G18-ER-ADM-17.01, Records Capture and Transmittal Delete 2-11000-ADM, ERP Administrative Procedures Manual Delete 2-11000-ADM-07.02, Vendor Selection 3-21000-ADM-10.01, Inspections 3-21000-ADM-18.02, Surveillance
20	25	8	At the top of the page, change the references to read as follows: 2-F94-ER-ADM-02.01, Training 3-21000-ADM-02.02, Personnel Qualifications Delete 3-21000-ADM-SW.05, Control of Rocky Flats Flood Waters

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94-DMP-002243

1. **PURPOSE**

94-DME-002243

This procedure defines the methods and responsibilities for conducting Readiness Assessments (RAs) by describing the steps used to obtain appropriate authorization for, and ensure appropriate control of, activities conducted by EG&G Rocky Flats, Inc. (EG&G) Rocky Flats Environmental Technology Site (RFETS) Environmental Restoration Program Division (ERPD). When performed, RAs provide the means for verifying and documenting that specified prerequisites and requirements have been satisfied and that a facility, system, or process (including a field activity) is ready to safely operate, restart, occupy, or proceed to the next phase, such as from planning to the initiation of a site investigation or to remediation.

2. **SCOPE**

94-DME-002273

This procedure applies to ERPD-controlled non-nuclear and appropriately determined Category 3 (low hazard) nuclear facilities/activities at RFETS, and particularly to ERPD activities discussed in the Statement of Work in the Final Environmental Restoration Interagency Agreement (IAG), and to other activities that may be designated. Specifically, RAs are performed before the initiation of work under any Operable Unit (OU) or any other field activity to include, but not be limited to, Resource Conservation and Recovery Act (RCRA) Facility Investigation/Remedial Investigation (RFI/RI) work plans (WPs), baseline risk assessments, treatability studies, remediation tasks, accelerated cleanup projects, decontamination and decommissioning activities, or any other activity designated by a Responsible Manager (RM).

This procedure addresses the following topics:

- Initiating an RA
- Preparing the RA Notice
- Developing the Checklist
- Resolving Checklist Comments
- Verifying the Checklist (conducting the RA)
- Preparing and Issuing the Evidence of Readiness Report
- Closing Poststart Open Items

94-DME-002273

If another type of readiness review or readiness assessment is required by a higher-level procedure, this procedure does not supersede the higher-level procedure. Specifically, if the completion of Appendix 2, the Readiness Assessment Worksheet (RAW), indicates that the subject activity is classified as nuclear, this procedure shall defer to the Readiness Determination Checklist and instructions found in 1-H24-ADM-10.01, Startup and Restart of Nuclear Facilities. If the Determination Checklist indicates that a Low Hazard Readiness Assessment (LHRA) is appropriate, then this ERPD procedure may be implemented. However, the Manager, Environmental Operations Management (EOM) may require implementation of this procedure even if another type of readiness review or readiness assessment is to be done or is required by a higher-level procedure.



This procedure applies to all EG&G employees and subcontractors participating in ERPD activities. An RA may also be conducted for activities in support of agency-directed research and development and technology demonstrations.

2. **SCOPE (continued)**

This revision is a total rewrite and revision bars are omitted. This revision supersedes 3-21000-ADM-18.03, Revision 0.

3. **OVERVIEW**

The RA is not a method to gain readiness to start or resume program work. However, it verifies that management has achieved readiness to operate before starting or resuming work.

This procedure contains instructions and explanations to guide RMs in initiating the ERPD RA process and in meeting the RA requirements. RAs are developed and conducted to ensure that, before starting operations, designated activities have been defined and approved in accordance with the IAG, including agency directives, and applicable Department of Energy (DOE) Orders. Emphasis is placed on compliance with environmental, operational, health and safety, quality assurance, and training requirements.

The RA process is also intended to verify compliance, as applicable, with operational or other requirements of other RFETS organizations, such as those of Waste Management, Engineering and Safety Services, Radiological Health and Engineering, and others. The need for such verifications is dictated by the scope of the activity involved, which may include requirements set forth by existing upper tier documents. Specific verifications may also be based on project-applicable requirements as stated in ERPD Operations Procedures (OPS), Health and Safety Plans (HASPs), Memoranda of Understanding (MOUs), and other similar documents. The RA process does not generate requirements such as those indicated above, but verifies ERPD compliance with requirements, as applicable.

This procedure also provides guidance for the development and closure of Checklists which provide the primary means of administrative continuity for the RA process. Each Checklist is developed with input from a Team composed of technically knowledgeable individuals under the leadership of the ERPD RA Coordinator. At a foundational level, the Checklists employ elements of the following programmatic documents:

- Rocky Flats Interagency Agreement (IAG)
- Rocky Flats Plant Sitewide Quality Assurance Project Plan (QAPjP) for Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) RFI/RI Studies and RCRA Facility Investigations/Corrective Measures Studies Activities
- RFETS ERPD Quality Assurance Program Description (QAPD)

94-DMR-002243

### 3. OVERVIEW (continued)

Finally, this procedure describes the administrative process by which an activity authorization is provided and documented, following successful closure and verification of Checklist items. Appendix 1, ERPD Readiness Assessment Flow Chart provides an overview of the RA process.

#### 3.1 Issues Addressed in Developing This Procedure

In the complex and dynamic ERPD operating environment, RMs need assistance with determining the applicability of numerous internal and external compliance requirements. A number of established sitewide programs may also impact the preparations for operations. The RA process and the Checklist, in addition to documenting readiness, are intended to provide a planning tool rather than present a last minute administrative frustration. The following objectives summarize the primary issues addressed:

- The ERPD RA process is not intended or designed to reevaluate preexisting programmatic elements. The objective is to employ a graded approach. This approach connotes a risk-based methodology for analyzing work activities that determine the degree of rigor and appropriate type of control required to optimize employment of human and material resources while meeting applicable standards and requirements. This objective also embraces the concept that if, for example, an Integrated Work Control Program (IWCP) package is required and approved, verification of such approval is accepted as constituting compliance with the requirements incumbent in that program.
- A primary objective of the ERPD RA process is to facilitate appropriate distinctions between readiness reviews of nuclear versus non-nuclear activities. While this procedure is directed primarily at compliance with DOE Order 5481.1B, Safety Analysis and Review System, it is also intended to comply with the requirements of DOE Order 5480.31, Startup and Restart of Nuclear Facilities, as they are applicable to Category 3 (low hazard) nuclear facilities. In accordance with the definitions in DOE Order 5480.31 and the thresholds for radionuclides listed in Table A.1 of DOE-STD-1027-92, Hazard Categorization and Accident Analysis Techniques for Compliance with DOE Order 5480.23, Nuclear Safety Analysis Reports, ERPD facilities and activities are not, generally, defined as nuclear. Appendix 2 of this procedure makes provision for identifying those ERPD activities that might be defined as nuclear and, therefore, be subject to the provisions of DOE Order 5480.31.
- The objective is to involve the RM early in the RA process, taking advantage of project knowledge to help ensure the proper content and rigor for the RA.

94-DMR-002293

3.1 **Issues Addressed in Developing this Procedure (continued)**

- The objective of the RA process is to encourage Checklist development as early as possible in the project's development. The desired result is that at the time of the startup the project is, with increased certainty, in compliance with applicable environmental, operational, health and safety, quality assurance, and training requirements. An RA is not intended to present, either in perception or in fact, an impediment to operational progress.

4. **DEFINITIONS**

**Activity Authorization Form (AAF).** The form used to document the final authorization to begin an activity once the RA has been completed. The AAF represents:

- Approval by the Director, ERPD.
- Authorization by the Manager, EOM.
- Acknowledgement of conditions and responsibility for open items by the Responsible Manager.

**Evidence of Readiness Report.** A documented summary of the RA prepared by the ERPD RA Coordinator.

**Graded Approach.** A risk-based methodology that analyzes work activities to determine the degree of rigor and appropriate type of control required to optimize employment of human and material resources while meeting applicable standards and requirements.

**Individual Hazardous Substance Sites (IHSSs).** Individual locations where hazardous substances have come to be located at a discrete area within the RFETS.

**Land Use Request (LUR).** The LUR form identifies the location and type of work to be accomplished, and is required for all activities within the Buffer Zone.

**Non-nuclear Facility.** A defined location or locations where activities or operations do not involve radioactive and/or fissionable materials in such form and quantity that there is no potential nuclear hazard to employees or the general public; i.e. levels are below Hazard Category 3 radionuclide threshold levels as listed in Table A.1 of DOE-STD-1027-92, Hazard Categorization and Accident Analysis Techniques for Compliance with DOE Order 5480.23, Nuclear safety Analysis Reports.

**Operable Unit (OU).** Groupings of IHSSs into a single management area, as defined in the IAG Statement of Work.

**Operational Safety Requirements (OSRs).** The requirements stated in the applicable safety analysis reports.

94-DMR-0022413

4. DEFINITIONS (continued)

**Poststart Open Item.** A Checklist item that has not been closed and verified and that, in the judgement of the RA Coordinator, may be cleared (closed) and verified after the authorization of operations without significant risk to the environment, project personnel, or the general public. A Poststart Open Item must carry a commitment from the responsible party for the closure action required, and the closure date must be specified.

**Prestart Open Item.** A Checklist item that has not been closed and verified and that, because of the potential impact, must be cleared (closed) and verified before the authorization of operations.

**Readiness Assessment (RA).** A requirements-based process that investigates and provides the means for verifying and documenting that specified prerequisites and requirements have been satisfied and indicates that a facility, system, or process (including a field activity) is ready to safely operate, occupy, or proceed to the next phase.

**RA Board (Board).** An ERPD management team that evaluates the sufficiency of a Checklist and, thereby, the scope of the RA. Normally, the Directors or direct-report Managers of non-affected ERPD organizations serve as Board members. The Manager, ERPD EOM, usually serves as the Chairperson.

**RA Checklist (Checklist).** A list of prerequisites, requirements, and other information that forms the basis for the RA, provides guidance for assessing readiness, and provides administrative continuity to the RA process. The ERPD RA Coordinator develops the Checklist.

**RA Notice.** A formal memorandum that provides:

- Scope and purpose, broadly identifying areas, and items to be assessed.
- Planned dates, times, locations, and other logistical information.
- Identification of the Board membership.
- Identification of the Team membership.

**RA Team (Team).** A group of individuals cognizant of the WP, Field Sampling Plan (FSP), Project Management Plan, and other activity baselines. The Team participates in generating the Checklist, and assesses and demonstrates to the Board the readiness of an activity to proceed, i.e. demonstrates that prerequisites have been met. The ERPD RA Coordinator serves as the Team Leader.

4. **DEFINITIONS (continued)**

**Work Plan (WP) and Field Sampling Plan (FSP).** Detailed plans developed for each OU, OU subprojects, and selected sitewide activities which ensure that each site is fully characterized and that a baseline risk assessment is performed. In addition to detailed technical discussions, each WP and FSP includes:

- Quality Assurance Addendum (QAA), that outlines those site- or project-specific measures taken to meet the requirements of the QAPjP.
- Data Quality Objectives that are qualitative and quantitative statements that specify the quality of data required to support decisions.
- OPS, including Document Modification Request(s) as needed to supplement existing procedures, that are required to properly implement the WP and FSP.
- Provision for the use of a scientific notebook, as applicable.

5. **RESPONSIBILITIES**

5.1 **Director, ERPD**

Provides oversight for the implementation of this procedure.

Provides final resolution on any disputes that cannot be resolved by the Board Chairperson.

Provides, on the AAF, conditional approval for the continuation or startup of operations.

5.2 **ERPD Commitments Tracking (CTS) Coordinator**

Ensures that Checklist Open Items are entered into the ERPD CTS, as appropriate.

5.3 **ERPD Document Control Center**

Ensures that RA records are managed in accordance with 2-G18-ER-ADM-17.01, Quality Assurance Records Management.

5.4 **ERPD Quality Assurance Program Manager**

Provides concurrence for activities relative to compliance with Quality Assurance (QA) requirements.

Assigns a quality Subject-matter Expert to serve as a member of each and every Team.

5. **RESPONSIBILITIES (continued)**

5.5 **ERPD Health and Safety Officer**

Reviews and approves all HASPs related to ERPD activities.

Serves as a Team member, as requested.

5.6 **ERPD Internal Assessments**

Ensures that the Checklist Open Items which affect quality are properly identified for an audit or surveillance.

5.7 **ERPD RA Coordinator**

Coordinates with the RMs to ensure that RAs are conducted when appropriate.

Serves as the Team leader and designates Team members.

Ensures that the Board members, Team members, and RMs or Project Managers (PMs) complete training in this procedure (Reading this procedure constitutes required training in accordance with 1-10000-TUM 02.18, Qualification, Certification, and Continued Training) and other applicable documents deemed appropriate in accordance with 2-F94-ER-ADM-02.01, Training.

Is responsible for development of Checklists.

Provides recommendation to the Manager, EOM, for the authorization to continue or start operations.

Prepares and distributes copies of the Evidence of Readiness Report to the RMs, the affected organizations, and contractor(s) or subcontractor(s).

Ensures that records are complete and transmitted to the ERPD Project File Center (PFC) in accordance with 2-G18-ER-ADM-17.01.

5.8 **ERPD Sample Management (functional title)**

Provides concurrence for activities that may require submission of data to Rocky Flats Environmental Data System (RFEDS).

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5. **RESPONSIBILITIES (continued)**

5.13 **Responsible Managers, ERPD**

Provide input and verifications, as required, on the requirements as indicated in the project baseline documents.

Provide Team member(s) representing the requisite expertise, as requested. Expertise may be required from any of the groups within ERPD.

Ensures that all personnel, including subcontractors, are trained and qualified to perform the duties, tasks, and responsibilities described in this procedure.

Ensures that all core and ERPD-specific training has been completed and documented, and that copies of all documentation have been forwarded to the ERPD training files.

94-0MR-002243



## 6. INSTRUCTIONS

- NOTE 1** *The RA Worksheet (RAW) (Appendix 2, ERPD Readiness Assessment Worksheet) and the Checklist are used to document the evaluation of an activity's readiness to begin, and the authorization to do so. As necessary, information provided on a RAW may be continued on additional blank pages, with the form header on each additional page.*
- NOTE 2** *The ERPD RA Coordinator may vary or modify the specific administrative steps described in this procedure in keeping with the concept of the graded approach, as long as the overall integrity of the assessment is maintained.*
- NOTE 3** *If field work or activity is suspended for more than 30 days, the RM must again initiate the RA process, even though a RA may have been previously completed for the activity.*

### 6.1 Initiating an RA

#### RM

- [1] Ensure that all requirements that are prerequisite to initiating the subject activity are being addressed before initiating an RA, and follow the general guidance provided in the RAW.
- [2] Verify that the activities affecting data quality or safety and health can be completed using existing procedures and instructions, such as approved WPs and HASPs.
- [3] **IF** adequate procedures and instructions do **NOT** exist,  
**THEN** arrange for the required procedures or instructions to be:
- Prepared.
  - Approved.
  - Controlled.
- [4] **WHEN** the necessary prerequisite requirements have been met,  
**THEN** initiate the balance of this procedure to obtain the authorization to initiate the subject activity.
- NOTE** *Approval to proceed, in the form of a signed AAF, must be obtained before the initiation of the subject activity.*
- [5] Complete Page 1 of the RAW.
- [6] Submit Page 1 of the RAW to the ERPD RA Coordinator with a memorandum requesting an RA.

94-DMR-002243

**6.2 Preparing the RA Notice**

**NOTE 1** *The request for an RA needs to be made at least 30 days before the scheduled or anticipated implementation or start date.*

**NOTE 2** *Determination of the applicability of the RA process to a given activity is a management decision, based on process, project, and programmatic knowledge. Section 2 of this procedure provides general guidelines on the applicability of the RA process.*

**ERPD RA Coordinator**

- [1] Determine if the activity is subject to an RA.
- [2] **IF** the activity is **NOT** subject to an RA,  
**THEN:**
  - [A] Issue a memorandum to the RM explaining the rationale for the determination, with copies as appropriate.
  - [B] Exit this procedure.
- [3] **IF** the activity is subject to an RA,  
**THEN** schedule a conference with the RM to:
  - [A] Ensure training and familiarization with this procedure.
  - [B] Discuss the project status and schedule.
  - [C] Complete Pages 2 and 3 of the RAW.
  - [D] Discuss the composition of the Team.
  - [E] Assign an RA identification number.
- [4] Prepare the RA Notice (Appendix 3, ERPD Readiness Assessment Notice), and submit the RA Notice with the proposed Team and Board memberships to the Manager, EOM.

**Manager, EOM**

- [5] Verify that the activity falls within the scope of the ERPD RA program and approve the Team and the Board as designated by signing the RA Notice.

94-DMP-002243

6.2 Preparing the RA Notice (continued)

Manager, EOM (continued)

- [6] IF the activity is NOT subject to an RA,  
THEN:

- [A] Issue a memorandum with copies as appropriate to the RM explaining the rationale for the determination.
- [B] Exit this procedure.

ERPD RA Coordinator

- [7] Distribute the completed, approved RA Notice to all affected personnel.

6.3 Developing the Checklist

Appendix 4, ERPD Readiness Assessment Checklist is a sample of a Checklist. The Checklist criteria should be focused so that, at a minimum, the assessment elements listed on Pages 2 and 3 of the ERPD RAW (Appendix 2) are evaluated and verified as either applicable or not applicable. For non-RFI/RI activities, similar areas may be addressed.

Appendix 2 also contains Suggested Minimum ERPD Checklist Criteria that provides guidance on programmatic and interorganizational elements. The applicable documents require approval, as appropriate, by the:

- DOE.
- Environmental Protection Agency (EPA).
- Colorado Department of Health (CDH).
- Director, ERPD.
- Appropriate RM(s).

ERPD RA Coordinator

- [1] Prepare an initial draft of the Checklist, using the completed RAW as a baseline document.

Team

- [2] Evaluate and verify the adequacy of the Checklist scope and content, using collective Team expertise and RAW criteria.

ERPD RA Coordinator

- [3] Complete the Checklist.

- [A] Compile and incorporate all Team input.
- [B] Verify and incorporate all requirement source citations.

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### 6.3 Developing the Checklist (continued)

#### ERPD RA Coordinator (continued)

- [C] Verify and incorporate the names of the RA task support individuals and the due dates into the Checklist.

#### Team

- [4] Concur with the Checklist scope and content by signing on the final page.

#### ERPD RA Coordinator

- [5] Submit the completed Checklist to the Board for approval.
  - [A] Include any pertinent backup or explanatory information.
  - [B] State the date by which comments are due.

**NOTE** *The fact that the Checklist content may be considered completed at this point does not preclude the addition, at some later date, of item(s) deemed appropriate by the Team.*

#### Board

- [6] Review the scope and content, not the status, of the RA, by using the Checklist as the primary review document.

**NOTE 1** *If the subject activity falls primarily under the management responsibility of the EOM Manager, the Board designates another of its members as Chairperson for the RA of that activity.*

**NOTE 2** *Appendix 6, ERPD Readiness Assessment Comment Record may be used to provide comments, if desired.*

- [7] Provide comments as appropriate to the Board member's area of expertise and programmatic concerns.

**NOTE** *If comments are not received by the ERPD RA Coordinator within 5 working days of submission (Step [4][B]), the status is considered as a No Comment. A No Comment constitutes an individual's approval of the Checklist.*

- [8] Submit comments to the ERPD RA Coordinator.

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6.3 **Developing the Checklist (continued)**

**ERPD RA Coordinator**

- [9] **IF**, collectively, the Board does **NOT** have ~~any~~ comments or concerns regarding the submitted Checklist,  
**THEN** go to Section 6.5, Verifying the Checklist.

6.4 **Resolving Checklist Comments**

**ERPD RA Coordinator**

- [1] **IF** the Checklist requires revision as a result of Board comments,  
**THEN** submit the comments to the Team for resolution.

**Team**

- [2] Discuss the comments and develop resolutions.  
  
[3] Document resolutions on the RA Comment Record.

**ERPD RA Coordinator**

- [4] Submit the Checklist with the RA Comment Record (proposed resolutions) to the Board for approval and return to Step 6.3[5].

**NOTE** *If appropriate/required for final resolution, the Chairperson may submit an unresolved issue to the Director, ERPD, for final disposition.*

**Board Chairperson**

- [5] **IF** Board agreement on proposed resolutions **CANNOT** be reached,  
**THEN** decide on the resolution.

- [6] Submit the approved Checklist to the ERPD RA Coordinator.

**NOTE** *Documentation of resolved Board comments, if any, constitutes Board approval of the Checklist.*

6.5 **Verifying the Checklist (Conducting the RA)**

**Team**

- [1] Provide verification/closure documentation for each Checklist item, as assigned.

6.7 Closing Poststart Open Items (continued)

ERPD RA Coordinator (continued)

- [9] WHEN a closure action is complete,  
THEN:

- [A] Place the closure package in the RA history file.
- [B] Notify the ERPD CTS Coordinator or ERPD Internal Assessments that the action is closed.

7. RECORDS

Management of all records is consistent with 1-77000-RM-001, Records Management Guidance for Records Sources.

ERPD RA Coordinator

- [1] WHEN all Open Items have been closed and verified,  
THEN ensure that the original and one copy of the following quality-related records, as appropriate, are transmitted to the ERPD Project File Center (PFC) in accordance with 2-G18-ER-ADM-17.01, Records Capture and Transmittal:

- RA Notices
- Approved Checklists, Checklist comment records, and Checklist item closure documents
- Evidence of Readiness Report
- Other formal documentation regarding the RA

**NOTE** *The RA document package is submitted under a table of contents page with sufficient detail to facilitate the location of specific RA documents.*

Submission of record copies to the ERPD PFC will satisfy Administrative Record requirements as defined in 3-21000-ADM-17.02, Administrative Record Screening and Processing.

Non-quality records generated by this procedure relate to documentation of editorial comments on annotated documents and draft Checklists as well as copies of the RAW (Appendix 2, ERPD Readiness Assessment Worksheet). These non-quality records may be discarded.

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8. REFERENCES

Rocky Flats Interagency Agreement, 01/22/91

Rocky Flats Plant Environmental Restoration Department Quality Assurance Program Description

Rocky Flats Plant Site-wide Quality Assurance Project Plan for CERCLA Remedial Investigation/Feasibility Studies and RCRA Facility Investigations/Corrective Measures Studies Activities, 05/05/91

DOE Order 5480.31, Startup and Restart of Nuclear Facilities

DOE Order 5481.1B, Safety Analysis and Review System

DOE-STD-1027-92, Hazard Categorization and Accident Analysis Techniques for Compliance with DOE Order 5480.23, Nuclear Safety Analysis Reports

1-21000-EMR-AQ.001, Implementation of the Chemical Tracking Process

1-21000-EMR-AQ.02, Notification of Potential Change to Air Emissions

1-21000-EMR-NEPA.01, Implementation of NEPA Documentation

1-21000-EMR-SW.01, Control and Disposition of Incidental Waters

1-77000-RM-001, Records Management Guidance for Records Sources

1-DOE-EPR-END.03, Identification, Protection, and Reporting of Threatened, Endangered, and Special-Concern Species

1-H24-ADM-10.01, Startup and Restart of Nuclear Facilities

2-G18-ER-ADM-17.01, Records Capture and Transmittal

2-G01-ER-ADM-06.01, Document Control

~~2-11000-ADM, ERPD Administrative Procedures Manual~~

~~2-11000-ADM-07.02, Vendor Selection~~

3-21000-ADM-10.01, Inspections

3-21000-ADM-18.02, Surveillance

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8. REFERENCES (continued)

2-F94-ER-ADM-02.01, Training

3-21000-ADM-02.02, Personnel Qualifications

~~3-21000-ADM-SW.05, Control of Rocky Flats Flood Waters~~

3-25000-ADM-AQ.07, Preparation of Air Pollution Emission Notices

3-25000-ADM-AQ.08, Preparation of EPA Form Rs

3-25000-ADM-SW.01, Monthly Discharge Monitoring Report for NPDES

3-25000-ADM-SW.02, Implementation of the Control and Disposition of Incidental Waters

3-25000-ADM-SW.05, Control of Rocky Flats Flood Waters

3-25000-OPS-SW.13, Dam Inspection and Monitoring Procedure

29 CFR 1926, Labor

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